REMARKS

Claims 1-26 are pending in this application, all of which claim have been amended. No new claims have been added.

Claims 1-26 stand rejected under 35 USC §102(e) as anticipated by U.S. Patent 6,236,395 to Sezan et al. (hereinafter "**Sezan et al.**").

Applicants respectfully traverse this rejection.

Sezan et al. discloses an audiovisual information management system including at least one description scheme. For audio and/or video programs a program description scheme provides information regarding the associated program. For the user a user description scheme provides information regarding the user's preferences. For the system a system description scheme provides information regarding the system. The description schemes are independent of one another. Preferably, the program description scheme, user description scheme, and system description scheme are independent of one another.

The Examiner has urged that column 14, line 45 - column 26, line 28 and column 27, lines 12-43 describe an audio data feature description method, wherein audio features are hierarchically represented by setting an audio program which means entire audio data constructing one audio program at the highest hierarchy and describing the audio features in order from higher to lower hierarchies.

Applicants respectfully disagree. Neither of these passages and none of the drawings show such a hierarchical representation of audio features.

The "program description scheme" in **Sezan et al.** only means a type of description scheme. **Sezan et al.** does not teach an audio data feature description method, wherein audio features are hierarchically represented by setting an audio program, which means entire audio

data constructing one audio program at the highest hierarchy and describing the audio features in order from higher to lower hierarchies.

The Examiner has referred to various Figures for showing the elements recited in the other independent claims 7-8 and 13-19.

Applicants respectfully disagree.

1. Contrary to the Examiner's assertion, Figs. 4-5 fail to relate to audio thumbnails, as recited in claim 7.

Figs. 4 and 5 in **Sezan et al.** teach only an interface for selecting programs. The "Thumbnail View" in column 15, line 39 of **Sezan et al.** appears to relate to a description of thumbnails, but **Sezan et al.** fails to teach "audio pieces" and "describing audio segment information of audio pieces as feature type", as recited in claim 7 of the present invention.

2. Contrary to the Examiner's assertion, Figs. 10-11 do not relate to the relationship between audio scenes, audio pieces or audio shots, as recited in claim 9.

Figs. 10 and 11 in **Sezan et al.** only teach an interface for reading programs. **Sezan et al.** fails to teach "audio shot" and "feature value of the audio shot are represented by san audio piece". It appears that "Highlight View" and "Event View" in column 16 correspond to those of Figs. 10 and 11, but the "Highlight View" and "Event View" comprise an identifier of start-frame, end-frame, and display-frame. They are representative sections extracted from a program. They differ from the present invention, representing feature values of one audio scene or one audio shot by an audio clip.

3. Contrary to the Examiner's assertion, Figs. 4-12 do not relate to audio data consisting of multiple channels or tracks, as recited in claim 13.

The Examiner appears to misunderstand what is meant by "channel". The "channel" in

Sezan et al. means TV channel which includes multiple contents. It is clear that a "key stream" of the present invention is not taught in **Sezan et al**. A "channel" of the present invention means multiple audio data such as multiple languages, deputy sound, etc. included in a single content.

4. Contrary to the Examiner's assertion, Figs. 3, 11 and 13 do not disclose a key event; that the content of the key event is described by text information; or that at least one audio segment corresponding to the key event is described, as recited in claim 14.

Although claim 14 appears to relate to "Event Profile" in column 16 of **Sezan et al.**, the "Event Profile" is different from the present invention. The "Event Profile" describes an event on video with "duration" comprised by two values of start-frame-id and end-frame-id, and adds a text and audio as an attached information. However, the present invention relates to an event on the audio itself. This is not taught by **Sezan et al**. Moreover, **Sezan et al.** does not teach that the key event is described as audio duration.

5. Contrary to the Examiner's assertion, Fig. 13 does not disclose a key object; that the content of the key object is declared and described by text information; on that at least one audio segment corresponding to the key object is described, as recited in claim 15.

Although it appears that claim 15 relates to "Object Profile" in column 20 of **Sezan et al.**, the "Event Profile" is different from the present invention. The "Object Profile" describes an object on video with "duration" comprised by two values of start-frame-id and end-frame-id, and adds a text and audio as an attached information. However, the present invention relates to an object on the audio itself. This is not taught by **Sezan et al**. Moreover, **Sezan et al.** fails to teach that the key object is described as audio duration.

6. Contrary to the Examiner's assertion, Fig. 8 does not refer to audio shots or audio slides, as recited in claims 16-17, respectively.

Fig. 8 only teaches an interface for reading programs. It appears that Fig. 18 corresponds to "Shot View" in column 15 and that "Slide View" is similar to the present invention. "Shot View" comprise start-frame-id, end-frame-id and display-frame-id, and "Slide View" comprises a line of frames. Neither represents audio duration. **Sezan et al.** does not teach the limitations of claims 16 and 17 of the present invention, namely, an audio program is represented as audio slide comprised by audio segment or audio file, the audio slide is declared and described as a feature type, and its feature value is described with audio segments or audio files.

7. Contrary to the Examiner's assertion, Figs. 3, 13 and 14 do not show that audio data for multiple feature types are described hierarchically according to the level values, as recited in claim 18.

A symbol 426 in Fig. 14 does not teach hierarchical description depending on level values. The symbol 426 seems to relate to "Key Frame View", including "Clip" comprised by three values of start-frame-id, end-frame-id and display-frame-id. This is different from claim 18 of the present invention, which recites a description of audio feature type and hierarchical description of audio segment based on it.

8. The Examiner has urged that Figs. 3, 6 and 15 show feature descriptions extracted from one or more audio video programs and organized into meta description data. This does not relate to feature descriptions extracted from multiple audio video programs based on a specific feature type, and constructing a feature description collection by using multiple extracted feature description, as recited in claim 19.

Figs. 3, 6 and 15 do not teach claim 19 of the present invention. Namely, **Sezan et al.**

aims to selecting and reading multiple programs by using metadata description, but it does not teach that new description groups is generated from the metadata description. However, claim 19 of the present invention relates to generating feature description groups based on a specific feature type from metadata of each of multiple programs.

Thus, the 35 USC §102(e) rejection should be withdrawn.

In view of the aforementioned amendments and accompanying remarks, claims 1-26, as amended, are in condition for allowance, which action, at an early date, is requested.

If, for any reason, it is felt that this application is not now in condition for allowance, the Examiner is requested to contact Applicants undersigned attorney at the telephone number indicated below to arrange for an interview to expedite the disposition of this case.

In the event that this paper is not timely filed, Applicants respectfully petition for an appropriate extension of time. Please charge any fees for such an extension of time and any other fees which may be due with respect to this paper, to Deposit Account No. 01-2340.

Respectfully submitted,

ARMSTRONG, WESTERMAN & HATTORI, LLP

William L. Brooks
Attorney for Applicant
Reg. No. 34,129

WLB/mla
Atty. Docket No. **001615**
Suite 1000
1725 K Street, N.W.
Washington, D.C. 20006
(202) 659-2930

23850
PATENT TRADEMARK OFFICE

H:\HOME\letitia\WLB\00\001615\amendment sep 2003